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DISTRICT OF ARIZONA	
BY _____	DEPUTY _____

5 Pro Se

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9 **IN THE UNITED STATES DISTRICT COURT**
FOR THE DISTRICT OF ARIZONA

10 United States of America,
11 Plaintiff

12 vs.

13
14 Samuel R Bateman,
15 Defendant

Case No. 22-cr-08092-SMB

MOTION TO ENFORCE
PROTECTIVE ORDER
AGAINST NETFLIX, INC
AND ARK MEDIA, LLC

THIS DOCUMENT IS NOT IN PROPER FORM ACCORDING
TO FEDERAL AND/OR LOCAL RULES AND PRACTICES
AND IS SUBJECT TO REJECTION BY THE COURT.

REFERENCE

LRCWP 5.4
(Rule Number/Section)

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20 Defendant, **Samuel Rappylee Bateman**, appearing pro se, respectfully
21 moves this Court to enforce the **Protective Order entered on July 6, 2023**
22 **(Docket No. 186)** pursuant to Rule 16(d)(1) of the Federal Rules of Criminal
23 Procedure, and to issue relief directed specifically to **Netflix, Inc. and Ark Media,**
24 **LLC.**

25
26 **I. Background**

27 1. On July 6, 2023, the Court entered a Protective Order (Dkt. 186) governing
28 discovery materials in this case. That order was issued to permit full

1 disclosure of the government's investigation while protecting the **private**
2 **and personally identifying information (PII) of victims and witnesses,**
3 **including minors,** and sensitive information about cooperators.

- 4 2. The Protective Order restricts dissemination of discovery materials beyond
5 the defense team and prohibits their use for any purpose other than preparing
6 the defense.
- 7 3. Upon information and belief, **Netflix, Inc.** and **Ark Media, LLC** have
8 obtained private journals, photographs, and video recordings that were
9 produced in discovery and are subject to the Protective Order.
- 10 4. Netflix and Ark Media are preparing to publish a documentary based on
11 these materials. Their possession and intended use of such evidence is
12 inconsistent with the Protective Order and threatens to expose sensitive PII
13 of victims and witnesses, including minors.

14 15 **II. Legal Standard**

16 Federal courts have broad authority to enforce protective orders issued under
17 Rule 16(d)(1). *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 34–36 (1984). These
18 orders are designed to protect the privacy and safety of victims, witnesses, and
19 cooperating individuals, and courts retain inherent power to ensure compliance.
20 Third parties who unlawfully obtain discovery materials covered by a protective
21 order may be subject to court enforcement proceedings. See *United States v. Smith*,
22 985 F. Supp. 2d 506, 543 (S.D.N.Y. 2013).

23 24 **III. Argument**

25 **A. Netflix and Ark Media's planned publication would violate the Protective** 26 **Order.**

27 The Protective Order was entered specifically to prevent dissemination of
28 unredacted PII of victims and witnesses, including minors, and to safeguard

1 sensitive information about cooperators. If Netflix and Ark Media publish the
2 protected materials, they will be circumventing the Court's order and undermining
3 its purpose.

4 **B. Enforcement is necessary to protect victims and witnesses.**

5 This case involves not only Defendant's rights but also the rights and safety of
6 victims and minors. Public dissemination of PII would cause irreparable harm by
7 exposing these individuals to harassment, stigmatization, or worse. Such harm
8 cannot be undone once private information enters the public sphere.

9 **C. The Court has authority to act against Netflix and Ark Media.**

10 Although they are non-parties, Netflix and Ark Media are subject to this Court's
11 authority where they possess materials governed by the Protective Order. The
12 Court has inherent power to bind those in possession of restricted discovery
13 materials and to prevent violations of its orders. See *Regal Knitwear Co. v. NLRB*,
14 324 U.S. 9, 14 (1945).

15
16 **IV. Relief Requested**

17 Defendant respectfully requests that the Court:


- 18 1. Issue an **Order to Show Cause** directing **Netflix, Inc. and Ark Media,**
19 **LLC** to explain how they obtained discovery materials covered by the
20 Protective Order (Dkt. 186);
- 21 2. Enjoin Netflix, Inc. and Ark Media, LLC from publishing, distributing, or
22 otherwise using any discovery materials subject to the Protective Order;
- 23 3. Order Netflix, Inc. and Ark Media, LLC to identify all protected materials in
24 their possession and return or destroy them in accordance with the Court's
25 directive; and
- 26 4. Grant such other relief as the Court deems just and proper to enforce
27 compliance with the Protective Order and protect the privacy of victims and
28 witnesses.

1 **V. Conclusion**

2 For the foregoing reasons, Defendant respectfully requests that the Court
3 grant this Motion and take immediate steps to enforce the Protective Order against
4 Netflix, Inc. and Ark Media, LLC.

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6 Respectfully submitted,

7 Dated: Sept. 4, 2025

8 

9 Samuel Bateman, Defendant
10 Pro Se
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Certificate of Service

I hereby certify that on this 24 day of September, 2025, I caused a true and correct copy of the foregoing **Motion to Enforce Protective Order** to be sent to the Clerk of the Court and served by **first-class U.S. mail, postage prepaid**, upon:

Dimitra Hotis Sampson

Office of the United States Attorney

District of Arizona


2 Renaissance Square

40 N Central Ave., Ste 1800

Phoenix, AZ 85004-4408

Dated this 24, day of September 2025.

Respectfully submitted,



Samuel Bateman, Pro Se